Message

From: Amandes, Christopher B. [christopher.amandes@morganlewis.com]
Sent: 1/26/2018 4:39:57 PM
To: Murdock, James [Murdock.James@epa.gov]
CC: Bernier, Roberto [bernier.roberto@epa.gov]; Stucky, Marie [Stucky.Marie@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Miles, James [miles.james@epa.gov]; Haas, Craig [Haas.Craig@epa.gov]; Quiroz Guadalupe_TCEQ [Guadalupe.quiroz@tceq.texas.gov]; 'Jason.Holloman@tceq.texas.gov' [Jason.Holloman@tceq.texas.gov]; 'Craig.Hill@pcs.hctx.net' [Craig.Hill@pcs.hctx.net]
Subject: RE: Additional Questions

James,

Please see below for the response to your question that we did not answer in our January 12 email below, and let me know if you have any further questions.

· Please tell me if you've provided this previously, but were the backup generators elevated, and if so, to what height?

Administration Building
Generator 4-GN-1 1.02 feet above adjacent natural ground
Generator 4-GN-2 2.04 feet above adjacent natural ground

Temperature Controlled Product Storage
Generator 21-GN-1 1.90 feet above adjacent natural ground

MPU Motor Control Center (MCC)
Generator 32-GN-1 0.51 feet above adjacent natural ground

Wastewater Treatment Plant Motor Control Center (MCC)
Generator 39-GN-1 0.80 feet above adjacent natural ground

MPU Thermal Oxidizer
Generator 43-GN-1 0.20 feet above adjacent natural ground

It should be noted that the elevation of adjacent natural ground varies across the site. For example, the backup generator at the MPU thermal oxidizer is at the highest elevation of all of the backup generators.

Chris

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From: Amandes, Christopher B.
Sent: Friday, January 12, 2018 1:56 PM
To: Murdock, James <Murdock.James@epa.gov>
Cc: bernier.roberto@epa.gov; stucky.marie@epa.gov; Thompson.steve@epa.gov; Sullivan.Greg@epa.gov; miles.james@epa.gov; Haas.Craig@epa.gov; guadalupe.quiroz@tceq.texas.gov; Jason.Holloman@tceq.texas.gov;

Craig.Hill@pcs.hctx.net
Subject: RE: Additional Questions

James,

Please see below for the responses to your questions from December and let me know if you have any further questions.

Chris

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-----Original Message-----
From: Murdock, James [mailto:Murdock.James@epa.gov]
Sent: Tuesday, December 19, 2017 9:57 AM
To: Amandes, Christopher B. <christopher.amandes@morganlewis.com>
Subject: Additional Questions

[EXTERNAL EMAIL]

Chris,

Thanks again for providing the additional information.

We have a few follow up questions:

- When did the trestle or other railroad construction that may have contributed to the bathtub effect take place?

  Arkema has consulted with a number of long-term employees (35 – 43 years) at the Crosby plant, and those employees believe that elevation of the railroad tracks along the north side of Highway 90 has remained the same for as long as they can recall.

- Does the facility have a date in mind to renew production, and does it currently have its normal amount of RMP chemicals on site?

  Arkema's current plan is to restart the plant and resume normal production during the latter half of the second calendar quarter of this year. The only two RMP chemicals at the Crosby plant are sulfur dioxide and isobutylene, and Arkema is currently storing a normal amount of these chemicals (about 50% of its storage capacity). Arkema has not added or reduced the amount of sulfur dioxide and isobutylene stored at the Crosby plant since the plant ceased production as part of its Hurricane Harvey preparations. Specifically, the current stored amounts of sulfur dioxide and isobutylene are approximately:

SO_2
Isobutylene (b) (3) (A)

· Is the facility planning on conducting a new PHA/siting analysis in light of the flooding?

Yes. Arkema is currently preparing those PHAs.

· Please tell me if you've provided this previously, but were the backup generators elevated, and if so, to what height?

The backup generators are elevated at various heights depending on their location. A third party engineering firm has been conducting an assessment this week that includes shooting the elevations of these generators, and we will follow up to provide this information when we have it.

· At our meeting we requested maintenance records and maintenance OPs for the refrigerated trailers and the nitrogen system; is Arkema able to provide those documents?

The maintenance of the refrigerated trailers is performed by the company that owns them, and Arkema does not have those records. However, Arkema does not believe that maintenance of the refrigerated trailers on-site played any role in the Hurricane Harvey incidents, because the trailers performed properly until they were inundated. Similarly, the maintenance of the nitrogen tank and most of the other equipment on the nitrogen tank pad is performed by Praxair, which is the company that provides Arkema's nitrogen supply. Arkema maintains the back-up nitrogen feed system, but this merely consists of a manifold, stainless steel hose, and a series of manual valves. Arkema performs any repairs of this equipment as needed, but the system is simple enough that there is no regular testing or inspection program. As with the trailers, Arkema is not aware that maintenance of the nitrogen system played any role in the Harvey incidents.

Thanks,

James Murdock

Assistant Regional Counsel

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